

# **EXHIBIT 3**



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**VIA CERTIFIED MAIL**

David I. Schoen, Esq.  
 David I. Schoen, Attorney at Law  
 2800 Zelda Road, Suite 100-6  
 Montgomery, AL 36106

Re: *Sokolow v. Palestine Liberation Org.*, No. 04-cv-397 (GBD-RLE)

Dear David:

Enclosed, please find copies of additional documents we are producing in this matter bearing Bates numbers TP 02:007823 – 02:008632, as well as the deposition transcript of Jawad Amawi taken in the case of *Shabtai Scott Shatsky et al. v. The Syrian Arab Republic, et al.*, Civil Action No. 02-2280 (RJL) (DDC), which I trust you already have.

In addition, as I offered to provide at the November 20, 2012 hearing before Magistrate Judge Ellis, please find below a list of the documents on which Defendants the Palestinian Authority and the Palestine Liberation Organization intend to rely for their capacity defense.

No.	Date	Description	Bates or Disclosure Reference
1.	11/15/1988	Political Communique of the Palestine National Council and the Declaration of Independence	Bates 02:008139-8154. Also appearing on Defendants' July 13, 2010 list of trial exhibits in the case of <i>Saperstein v. Palestinian Authority</i> , 04-20225-CIV-Seitz/O'Sullivan (S.D. Fla.) at Exhibit 23 previously produced to Mr. Tolchin.
2.	09/09/1993	Israel-PLO Recognition: Exchange of Letters between PM Rabin and Chairman Arafat	Bates 02:008155-8156. Also appearing on Defendants' July 13,

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		between PM Rabin and Chairman Arafat	Also appearing on Defendants' July 13, 2010 list of trial exhibits in the case of <i>Saperstein v. Palestinian Authority</i> , 04-20225-CIV-Seitz/O'Sullivan (S.D. Fla.) at Exhibit 25 previously produced to Mr. Tolchin.
3.	09/13/1993	United Nations Doc. A/48/486, S/26560 - Declaration of Principles on Interim Self-Government Arrangements	Bates 02:008157-8194. Also appearing on Defendants' July 13, 2010 list of trial exhibits in the case of <i>Saperstein v. Palestinian Authority</i> , 04-20225-CIV-Seitz/O'Sullivan (S.D. Fla.) at Exhibit 26 previously produced to Mr. Tolchin.
4.	05/04/1994	United Nations Document A/49/180 - Agreement on the Gaza Strip and the Jericho Area	Bates 02:8198-8240. Also appearing on Defendants' July 13, 2010 list of trial exhibits in the case of <i>Saperstein v. Palestinian Authority</i> , 04-20225-CIV-Seitz/O'Sullivan (S.D. Fla.) at Exhibit 31 previously produced to Mr. Tolchin.
5.	09/28/1995	United Nations Document A/51/889 - Israeli-Palestinian Interim Agreement on the West Bank and the Gaza Strip	Bates 02:008241-8303. Also appearing on Defendants' July 13, 2010 list of trial exhibits in the case of <i>Saperstein v. Palestinian Authority</i> , 04-20225-CIV-Seitz/O'Sullivan (S.D. Fla.) at Exhibit 32 previously produced to Mr. Tolchin.
6.	6/16/2010	The deposition transcript of Hasan Abu-	Produced to Mr. Tolchin

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		Libdeh taken in the case of <i>Estate of Klieman v. The Palestinian Authority</i> , Civil Action No. 04-1173 (PLF/JMF) (DDC)	on May 29, 2012.
7.	9/6/2012	The deposition transcript of Jawad Amawi taken in the case of <i>Shabtai Scott Shatsky et al. v. The Syrian Arab Republic, et al.</i> , Civil Action No. 02-2280 (RJL) (DDC)	Produced to Plaintiffs' counsel on December 3, 2012.
8.	6/7/1990	<i>Klinghoffer et al. v. PLO et al.</i> , 739 F. Supp. 854 (SDNY 1190)	Bates labeled 02:007747-7757.
9.	12/29/2006	<i>Estate of Klieman v. The Palestinian Authority et. al.</i> , 467 F. Supp. 2d 107 (DDC 2006)	Bates labeled 02:007758-7763.
10.	9/30/2008	<i>Estate of Mark Parsons et al. v. The Palestinian Authority et. al.</i> No. 07-1847, (DDC, filed Sept. 30, 2008)	Bates labeled 02:007764-77.
11.	7/24/2001	<i>Estate of Yaron Ungar et al. v. The Palestinian Authority et. al.</i> , 153 F. Supp. 2d 76 (D. RI 2001)	Bates labeled 02:007778-7791.
12.	4/18/2012	<i>Mohamad et al. v. The Palestinian Authority et. al.</i> 556 US (2012).	Bates labeled 02:007792-7807.
13.	11/26/2012	United Nations Document A/67/L.28 – Agenda Item 37, Question of Palestine	Bates 02:008629-8632.

Defendants believe that the documents appearing on Defendants' July 13, 2010 list of trial exhibits in the case of *Saperstein v. Palestinian Authority*, 04-20225-CIV-Seitz/O'Sullivan (S.D. Fla.), which were incorporated by reference in their 26(a)(1)(A) disclosures as submitted to Plaintiffs on July 25, 2011, are already in Mr. Tolchin's possession. Because some are listed in the chart above, in order to avoid any claims that Plaintiffs' counsel do not have them, Defendants are hereby producing those documents again in the enclosed production, bearing Bates numbers 02:007899- 02:008628.

I am also enclosing some additional subpoenas which we will be serving in this matter.

Sincerely,



Brian A. Hill

Enclosures

cc. Robert J. Tolchin (Via Certified Mail)